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14 ACCESS INDUSTRIES and LEN BLAVATNIK

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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 DOWNTOWN CRENSHAW RISING,
a not for profit organization; et al.,

20 Plaintiffs,

21 v.

22 DEUTSCHE BANK, a foreign entity
23 registered in New York; et al.,

24 Defendants.
25
26

Case No.: 2:24-cv-07266-CV-MAA

**STIPULATION REGARDING
VOLUNTARY DISMISSAL AS
TO DEFENDANTS ACCESS
INDUSTRIES AND LEN
BLAVATNIK**

Judge: Hon. Cynthia Valenzuela

Complaint served: January 3, 2025

1 **WHEREAS**, on August 26, 2024, Plaintiffs Downtown Crenshaw Rising and
2 Members Against Anti-Black Racism at Public Pension Funds (collectively,
3 "Plaintiffs") filed the initial complaint in the above-captioned matter (the "Action")
4 [ECF No. 1];

5 **WHEREAS**, on November 22, 2024, Plaintiffs filed a First Amended
6 Complaint naming Access Industries ("Access") and Len Blavatnik ("Blavatnik") as
7 defendants [ECF No. 45];

8 **WHEREAS**, on March 18, 2025, Access and Blavatnik filed their motion to
9 dismiss the First Amended Complaint [ECF No. 143];

10 **WHEREAS**, Plaintiffs have agreed to dismiss Access and Blavatnik, without
11 prejudice;

12 **NOW, THEREFORE**, Plaintiffs and Defendants, through their undersigned
13 counsel, hereby stipulate as follows:

14 1. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs
15 hereby voluntarily dismiss, without prejudice, their claims in the Action against
16 Access and Blavatnik, with Plaintiffs reserving all rights;

17 2. Each party shall bear their own costs and attorneys' fees;

18 3. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), this notice of
19 voluntary dismissal does not require an order from the Court, and therefore, this
20 voluntary dismissal of Defendants Access and Blavatnik is self-executing.

21
22 DATED: April 2, 2025

23 IVIE McNEILL WYATT PURCELL & DIGGS

24 By: /s/ Ryan C. C. Duckett

25 RYAN C. C. DUCKETT

26 Attorneys for Plaintiffs

27 DOWNTOWN CRENSHAW RISING and MEMBERS
28 AGAINST ANTI-BLACK RACISM AT PUBLIC
 PENSION FUNDS

*The filer, Ryan C. C. Duckett, attests that all other
signatories listed, on whose behalf this filing is*

*submitted, concur in the filing's content and have
authorized the filing.*

DATED: April 2, 2025

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Virginia F. Milstead
VIRGINIA F. MILSTEAD
Attorneys for Defendants
ACCESS INDUSTRIES and LEN BLAVATNIK